

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

IN RE: ETTA BROUILLETTE Debtor	§ § §	CASE NO. 04-82750-G3-7 CHAPTER 7
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FROST NATIONAL BANK	§ §	Adv. No. 05-08016
vs.	§ §	Adv. No. 05-08017
ETTA DAVIDSON BROUILLETTE	§ §	

UNOPPOSED
MOTION TO CONSOLIDATE FOR JOINT ADMINISTRATION

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF SOUGHT.

COMES NOW, ETTA BROUILLETTE, Debtor and Defendant in the above-numbered and entitled causes, and files this her Motion to Consolidate for Joint Administration and would show as follows:

1. Etta Brouillette filed her Chapter 7 bankruptcy on December 22, 2004 in cause number 04-82750-G3-7; Robbye Waldron is the Trustee and a no-asset report has been filed.
2. On March 24, 2005, Frost National Bank filed two adversaries against Etta Brouillette, bearing causes numbers 05-08016 and 05-08017. One adversary case seeks to bar the Debtors discharge, while the other is to determine dischargeability of a specific debt owed to Plaintiff by the Debtor.
3. Both adversaries filed by Frost National Bank involve the same parties and involve common issues of fact and proof. Plaintiff is represented by James Cuellar in both adversary cases.
4. Consolidation for the purpose of Joint Administration will allow the most expiduous

disposition of the case and will be a convenience to all parties and to the court.

5. Plaintiff's counsel in both adversaries, James Cuellar, has indicated is has no opposition to joint administration of the cases.

WHEREFORE Debtor prays that the Court consolidate both adversary cases for Joint Administration.

Respectfully submitted,

GIPSON AND NORMAN

/s/ Ronald M. Gipson

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on June 14th, 2005, a true and correct copy of the foregoing Motion for Consolidation was served via regular US Mail, postage prepaid on opposing counsel, James Cuellar, at:

/s/ Ronald M. Gipson

Ronald M. Gipson

Attorney for the Debtor

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